

Reade W. Seligmann  
ALSTON & BIRD LLP  
90 Park Avenue, 12th Floor  
New York, NY 10016-1387  
Telephone: (212) 210-9453  
reade.seligmann@alston.com

Kristine M. Brown (admitted *Pro Hac Vice*)  
Donald M. Houser (admitted *Pro Hac Vice*)  
ALSTON & BIRD LLP  
1201 West Peachtree Street  
Atlanta, Georgia 30309-3424  
Telephone: (404) 881-7000  
kristy.brown@alston.com  
donald.houser@alston.com

*Attorneys for Defendant Optum360, LLC*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

IN RE: AMERICAN MEDICAL  
COLLECTION AGENCY, INC.  
CUSTOMER DATA SECURITY  
BREACH LITIGATION

*This Document Relates To: All Actions  
Against Quest Diagnostics, Inc. and  
Optum360, LLC.*

Civil Action No. 2:19-md-02904  
(MCA-MAH)

**DECLARATION OF DONALD HOUSER IN SUPPORT OF  
MOTION TO SEAL CONFIDENTIAL MATERIALS**

I, Donald M. Houser, do declare and state as follows:

1. I am an attorney admitted to practice in Georgia. I am a partner at Alston & Bird LLP, 1201 West Peachtree Street, Atlanta, GA 30309. Alston & Bird LLP represents Defendant Optum360, LLC (“Optum360”) in this action.

2. I am submitting this Declaration based upon my personal knowledge, information, and belief.

3. I submit this declaration in support of Defendants’ Motion to Seal Confidential Materials, namely, portions of the Special Master Discovery Order and accompanying transcript (Dkt. No. 742) (hereinafter, the “Confidential Materials”).

4. The Confidential Materials contain information that has been designated as Confidential or Highly Confidential by Optum360 and is subject to the Confidentiality Order entered in this case or is otherwise confidential.

5. In support of Optum360’s Motion, attached to this Declaration is an Index required by Local Civil Rule 5.3(c)(3) setting forth, among other things, the basis for sealing the Confidential Materials.


6. As set forth in the Index to this Declaration, Optum360 asserts and upon information and belief it is my understanding, that the Confidential Materials contain Optum360’s confidential and proprietary business information.

7. As set forth in the Index to this Declaration, Optum360 asserts and upon information and belief it is my understanding, that if the Confidential Materials become available to the public, third parties may potentially use such information to Optum360’s detriment.

8. Accordingly, it is respectfully requested that the Court grant Defendants' Motion to Seal the Confidential Materials.

9. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 13, 2024

  
Donald M. Houser, Esq.